

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AULISTAR MARK, HANCHEN LU and	:	
ANDREW HUDSON, Individually and on Behalf of	:	
All Others Similarly Situated,	:	
	:	
Plaintiffs,	:	Civil Action No. 1:13-cv-04347-AJN
-against-	:	
	:	
GAWKER MEDIA LLC, and NICK DENTON,	:	
	:	
Defendants.	:	
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AFFIDAVIT OF JESSICA COEN

JESSICA COEN declares, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am of legal age and am competent to make this Declaration. I have personal knowledge of the facts sets forth in this Declaration, or I have learned said facts to speak on behalf of Gawker Media, LLC.

2. I have worked for Gawker Media, LLC ("Gawker") twice. I worked as Editor-In-Chief ("EIC") of Gawker.com from 2004 until 2006, then left to work at *Vanity Fair* magazine and *New York* magazine, and finally in 2010 I returned to Gawker as the EIC of Jezebel, Gawker's women's fashion, celebrity, and news-focused website. Working or interning at Jezebel is generally respected within the industry. It's a desirable job.

3. Though there is no formal "internship program" at Jezebel, I was responsible for recruiting interns when I was EIC. I would post an internship opening on Jezebel.com and would usually note that the internship was very minimally compensated. I entitled some posts "So you want to be a Jezebel intern?". I received a large number of

resumes and read through them myself. I also received applications directly to my email, even when I did not have a relevant internship posting on the site. Once, I approached and brought on an intern who did not apply directly, but was recommended by a colleague.

4. There are no formal requirements for the internship. I inherited a few interns when I became EIC, and besides them I only had four or five interns that I myself brought on during my tenure.

5. During my tenure, I provided a small stipend to Jezebel interns (at times, \$100/month). Compensation was advertised in the posting on the website, though I never advertised specific numbers in the posts.

6. The interns performed a wide variety of tasks in order to give them an understanding of how the site works as a whole. They would crunch numbers for fashion week, which consisted of counting the number of models of color who appeared in the fashion shows; create roundups of links, which involved scanning headlines every morning or every few hours throughout the day and sending a list of interesting stories to editors; transcribe recorded interviews of people that would be used in potential stories; and assist with the tabloid round up, which involved reading through the weekly tabloids and summarizing the magazine for editors. Most of the assignments were simple and taught the interns small parts of specific tasks that a website writer or editor would perform, and the skills were transferable to other online publications. On rare occasions, an intern would be allowed to post to the site, in which case they always received a byline.

7. Because there was no formal program, interns did not have set hours or a required number of hours. We often scheduled interns to come online in the morning so they could work at their jobs or go to school in the afternoon. The internships were open-ended; some interns stuck around for a few months, others were with us for more than a year. Some interns would leave because they received a job offer at another media organization. The interns were not required to be in the office, and some were remote. The interns worked around 10 hours per week on average, and sometimes more during larger projects.

8. We did not have a formal training program. I or another editor would assign simple tasks that would illustrate a small part of how Jezebel operates, and interns definitely had enough off-hours time to work on their own personal projects or school work. Many of the day-to-day tasks required the interns to be taught with various levels of training and supervision. The process of creating the weekly tabloid roundup was more complicated than either link roundups or fashion week coverage, so consequently the training was more involved. The interns each had to be taught about tabloid roundups one-on-one with an editor. Writing skills took even longer to build and had much more of a learning curve than all of the above tasks. For instance, interns would draft a piece for the Wednesday tabloid roundup, Midweek Madness, and an editor would edit and work with the intern to show them how to improve the piece.

9. The interns never supervised each other.

10. The amount of experience and training Jezebel interns received varied by intern. Simply observing what it is like to work at a place like Gawker is valuable, and internships at Gawker sites are good for a person's resumé. Many former Gawker interns



found great jobs in the industry after their internships. I consider Gawker to be a very good training ground for writing and publishing online, and I believe interns leave with a clear idea of the extremely fast pace of online publication. Some interns also learned how to write with a specific tone, and how the assignment process works. It is an invaluable experience to work with any editor directly, and several Jezebel interns had the opportunity to work with editors one-on-one.

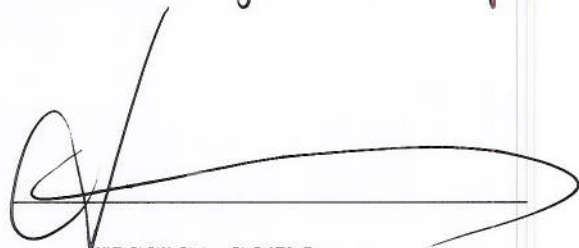
11. After the internships were done, I wrote some of the interns recommendations when they requested them.

12. I never promised anyone a job after the internship, but some interns were hired after the internship.

13. Because the interns are inexperienced, they took time from my schedule to supervise. We could have easily avoided having interns and would have performed work more efficiently without them. Interns did not displace paid employees.

I declare under the penalty of perjury under the laws of the State of New York and the United States of America that the foregoing is true and correct.

Executed this 10<sup>th</sup> day of January, 2014 in New York, New York



JESSICA COEN